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MEMORANDUM

TO: Steven Cipot, RPM

FROM: Robert M. Alvey, P.G. 

DATE: December 9, 2003

RE: **Quarterly Monitoring Report, 3rd Quarter 2003**
L.E. Carpenter Site, Wharton, NJ

I have reviewed the 3rd Quarter Monitoring report submitted by RMT Inc. for the L.E. Carpenter Superfund site in Wharton, NJ. If you have any questions concerning these comments, please feel free to call me at 7-3258. I concur with your assessment that the apparent free product thickness in MW-3, at the eastern downgradient edge of the free product area, roughly doubled to 0.93 feet in comparison with the April 2003 measurements. Measurable free product was observed in 15 of the 69 wells monitored in August. Previous reports have estimated between 8,000 and 13,000 of recoverable free product. The recovery of free product during the quarter was roughly 50 gallons, and since 1997 approximately 3,900 gallons have been recovered.

1. Page 2-2, West-Central Region of Free Product.

The report states "the total volume of apparent free product increased from .39 gallons in July 2003 to 1.31 gallons in September 2003." Based on the data, this statement does not make sense. There is a 1 foot thickness contour shown on Figure 3. Please provide an explanation of this discrepancy. The data in Table 2 indicates maximum historic total free product at about 30 gallons throughout the site.

2. Page 3-1. The MNA workplan, approved by NJDEP in January 2002 is stated as not yet being initiated, other than some of the low-flow sampling SOPs. What is the schedule for installing the additional monitoring wells or initiating the remaining actual workplan? Based on a "tentative" mobilization for free product remedial activity in August/September 2004, outlined in the report, would 2005 be too early to anticipate starting?

3. As per our recent conversation, it is my understanding that the PRP will be requesting EPA withdraw its comments to the lead soil remediation FFS. Has the PRP formally requested to withdraw the FFS? This 3rd quarter 2003 monitoring report contains discussions pertaining to October 2003 EPA/NJDEP meetings on the subject, which, for point of reference, occurred in the 4th quarter.

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4. Table 6. Groundwater Elevations. It is recommended that historic maximum and minimum groundwater elevations be noted on the table. Please explain how product thicknesses are calculated based on product elevation and water elevation. I cannot compute the 0.38 ft thickness shown for CW-1 using the elevations shown on the table. Nor can I use this data to check the consultant's assertion that there is an upward groundwater flow from the bedrock or deeper aquifer system. One well pair, MW-14, appears to have opposite data. It is not necessary to include all well installation and survey details on the table.

cc: A. Carpenter
V. Pitruzzello